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ANIMAL DISEASE TRACEABILITY RESPONSIBILITIES FOR VETERINARIANS



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You have probably seen articles or heard discussions about animal disease traceability (ADT) over the last couple of years, primarily related to the application of eartags within the cattle industry. In this article, I would like to review how the emerging ADT concept will affect veterinarians.

Both the U.S. Department of Agriculture (USDA) Veterinary Services and the Texas Animal Health Commission (TAHC) have recently adopted rules that not only impact the various livestock species but veterinarians as well. The USDA rule that went into place in March 2013 requires that all adult livestock crossing state lines have official identification and that they will move on health certificates (CVI). There are numerous exceptions, including that animals can move on owner shipper statements in lieu of CVIs under certain situations and that animals may be tagged upon arrival at approved tagging facilities under certain situations, but generally they need a CVI and eartag to cross state lines.

The main change that veterinarians will see is the enhanced scrutiny that state animal health agencies will perform on CVIs. That is because the USDA is going to hold states accountable for poor traceability systems through routine testing of the agencies on how quickly they can trace animals and tags back to the herd of origin. Texas is currently undergoing the second test of our system by the USDA in the past six months. Their standards for turnaround times on tracing an eartag will get more stringent over time. Our recent test was that USDA sent us 10 random cattle eartag numbers and we were told to figure out whose animal received the tag as quickly as possible. We figured out nine of 10 within the first week, but the last eartag was issued to a Texas veterinarian who told us he just didn't keep any records like that.

So all states will be looking more closely at the CVIs you write, especially as related to any required identification not recorded on the document or applied to

an animal. Because the states could be deemed as out of compliance if they fail the traceability tests, they are going to be working more closely with veterinarians to ensure they understand their role. I predict many states will also be turning over to USDA investigators at a much higher rate any CVIs written that are not complete or in violation of entry rules. This could lead to a veterinarian losing their USDA accreditation. The new TAHC authorized personnel rules will also hold a veterinarian accountable for incomplete or incorrect information provided on a CVI.

The TAHC has also recently passed Texas ADT rules, partially related to conforming with the USDA requirements for interstate movement but also specifically related to adult Texas cattle changing ownership within Texas. Basically, unless an adult cow or bull is headed directly to slaughter, they will need an official permanent identification applied within seven days of the sale if they don't already have a tag. This means a cattle producer may roll up to a veterinary clinic and ask to have ID applied to recently purchased cattle to conform with state rules. The veterinarian is free to do it or not and free to charge whatever is deemed acceptable, but if official ID is applied, that is where the new rules come into play.

First and foremost caution should be used to determine if the identification applied is acceptable. The most commonly applied official ID in adult cattle will include the USDA silver test tags, orange calfhood vaccination tags, U.S. origin "840" series RFID tags and registered firebrands or tattoos if the producer has the corresponding paper to go with the cattle. The most important difference now, however, is that the veterinarian may be applying tags simply for ADT reasons and must record them and keep those records for a minimum of five years. It is also not permissible (or necessary) under most situations now to retag or apply a new official ID if one is already present.

There are still no national or Texas

rules related to feeder cattle currently, but that will change over the next few years. The U.S. feeder industry is already strategizing over how to implement official ID requirements for their younger class of cattle. They believe it is better to figure out for themselves the best way to do it rather than wait to see what the USDA will require, and they are right. The USDA has made it public that they will begin promulgating ADT rules for feeder/stocker cattle in the next few years.

The USDA also has rules in place for animal ID in other species besides cattle. The swine industry has become very progressive in their use of "PIN" tags that correlate back to premise of origin identification, and they are now standard issue for the show hog folks. Even slaughter hogs will be required to have PIN tags by next year, or the major swine packing plants have said they will not buy them.

The message here today is for you to please read up on the latest changes related to animal ID for your clients and your practice. You can find all of the information on the Texas Animal Health Commission website. We don't want anyone to get in trouble over these new changes. You as a practicing veterinarian don't have to apply ID for someone if you don't want to, but if you do, there are new rules in place. And if you are writing a CVI for interstate movement, as always, please check the state of destination for their most current rules. There are some states that already require official ID on all classes of cattle, and you can be assured that all states will be watching for non-compliance on CVIs for ADT reasons much closer than ever before.

Finally, if you hold USDA type 2 Accreditation status (mixed/large animal) and have not recently received a letter from TAHC about your new state authorized personnel status, please contact your closest TAHC office. As always, thanks for all you do in protecting the health of Texas livestock and poultry. [TV](http://www.tahc.org)